

# **EXHIBIT A**

Material	Basis for Sealing	
	Disclosure Result in Clearly Defined and Serious Injury	No Less Restrictive Alternative to Sealing
<b>Declaration of Serrin Turner (ECF No. 27-1)</b>	<p>The information at issue contains sensitive financial and personal details of a Covered Person.</p> <p>Disclosure of this information would violate Daniel's Law and compromise the safety and privacy of the individual involved.</p>	No less restrictive alternative is available.
¶¶ 5 through 7	<p>Discloses search platforms used to obtain mortgages of Covered Persons.</p> <p>Publication would violate Daniel's Law and expose Covered Persons to potential harm.</p>	No less restrictive alternative is available.
¶ 8	<p>Discloses Covered Person's LinkedIn information.</p> <p>Publication would violate Daniel's Law and expose Covered Persons to potential harm.</p>	No less restrictive alternative is available.
¶ 9	Discloses Covered Person's Public Realtor profile.	No less restrictive alternative is available.
¶ 10	<p>Discloses third-party website used to obtain Covered Person's phone number.</p> <p>Disclosure would violate privacy rights and potentially endanger the Covered Person.</p>	No less restrictive alternative is available.
¶ 11	<p>Discloses third-party website used to obtain Covered Person's phone number.</p> <p>Disclosure would violate privacy rights and potentially endanger the Covered Person.</p>	No less restrictive alternative is available.

¶ 12	<p>Discloses third-party website used to obtain Covered Person's personal information.</p> <p>Disclosure would violate Daniel's Law and compromise the safety and privacy of the individual.</p>	No less restrictive alternative is available.
<b>Exhibit 2 – Mortgage # 1 (ECF No. 27-2)</b>	<p>The information at issue contains sensitive financial and personal details of a Covered Person.</p> <p>Disclosure of this information would violate Daniel's Law and compromise the safety and privacy of the individual involved.</p>	No less restrictive alternative is available.
<b>Exhibit 3 – Mortgage #2 (ECF No. 27-4)</b>	<p>The information in question contains sensitive financial and personal details of another Covered Person. Searches conducted on the government website, as identified by the Defendants, do not yield results for the individual Plaintiffs as set forth in this exhibit. Instead, a search for the Individual Plaintiffs returns more results related to filings in the present case than to the individuals' mortgage records.</p> <p>Disclosure of this information would violate Daniel's Law and compromise the safety and privacy of the individual involved.</p>	No less restrictive alternative is available.
<b>Exhibit 4 – Mortgage #3 (ECF No. 27-5)</b>	<p>The searches conducted for the individual name and related variations do not yield any results for his address or mortgage records on the initial pages of results. Instead, the searches return information about other individuals with the same name, including professionals and public figures, as well as several</p>	No less restrictive alternative is available.

	<p>obituaries. Additional searches using more specific terms lead to similar results, without locating relevant personal mortgage information.</p> <p>To access property records through the government website cited by the defendants, multiple steps would have been required, including navigating through various menus and selecting specific search criteria. The mortgage document cited in the defendants' declaration appears among numerous unrelated results, with the relevant record being buried deeper within the search results.</p> <p>Disclosure of this information would violate Daniel's Law and compromise the safety and privacy of the individual involved.</p>	
<b>Exhibit 5 – LinkedIn Page (ECF No. 27-6) – Defendants' Moving Br. at footnote 4</b>	Discloses the LinkedIn profile of a Covered Person, revealing personal and professional details. Disclosure could lead to privacy violations and potential harm to the individual.	No less restrictive alternative is available.
<b>Exhibit 6 – Realtor Profile (ECF No. 27-7) - Defendants' Moving Br. at footnote 4</b>	<p>Contains sensitive information related to the professional activities of a Covered Person.</p> <p>Disclosure of this information would violate Daniel's Law and compromise the safety and privacy of the individual involved.</p>	No less restrictive alternative is available.
<b>Exhibit 7 – NJSPBA Press Release (ECF No. 27-8)</b>	<p>Contains sensitive information related to the professional activities of a Covered Person.</p> <p>Disclosure could lead to privacy violations and compromise the individual's safety.</p>	No less restrictive alternative is available.

<p><b>Exhibit 8 – Retirement Party Announcement (ECF No. 27-9)</b></p>	<p>The information in question contains personal information of an Individual Plaintiff.</p> <p>Disclosure of this information would violate Daniel’s Law and compromise the safety and privacy of the individual involved.</p>	<p>No less restrictive alternative is available.</p>
<p><b>Exhibit 9 – Business Profile (ECF No. 27-10)</b></p>	<p>Discloses personal and professional information of a Covered Person within a business context.</p> <p>Disclosure could compromise privacy and lead to potential risks under Daniel’s Law.</p>	<p>No less restrictive alternative is available.</p>
<p><b>Exhibit 14 – Atlas Daniel’s Law Service Terms (ECF No. 27-15)</b></p>	<p>This document contains sensitive information that could reveal how Atlas’s systems operate, posing security risks.</p>	<p>No less restrictive alternative is available.</p>
<p><b>Exhibit 14 – Atlas Spreadsheet (ECF No. 27-16)</b></p>	<p>This document contains sensitive information that could reveal how Atlas’s systems operate, posing security risks.</p>	<p>No less restrictive alternative is available.</p>
<p><b>Defendants’ Request for Judicial Notice (ECF No. 27-34)</b></p>	<p>The request for judicial intervention includes references to and materials from records and other documents submitted by Defendants. These exhibits contain sensitive information related to Covered Persons, protected under Daniel’s Law. Sealing is necessary to prevent the disclosure of this sensitive information, which could compromise the privacy and safety of the individuals involved.</p> <p>The detailed information within the exhibits includes personal details that, if disclosed, would violate legal protections and endanger the individuals’ privacy.</p>	<p>No less restrictive alternative is available.</p>

	Sealing is thus essential to comply with statutory obligations and to ensure that no sensitive information is improperly disclosed.	
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